

(Email)

Comments on MA DOER building labeling white paper

From Jon Braman, Manager of Multifamily Building Projects

Bright Power, Inc.

jbraman@brightpower.com

(212) 803 5868 x 2008

1. Overall, the concept of combining the asset and operational rating in a building labeling program is an exciting one. MA DOER should be prepared for a big process of market education. Even for owners who are interested and motivated, a number of good questions will need to be answered (e.g. What does it mean to get a high asset rating but low operational rating or vice versa? Are both operational and asset ratings legitimate methods? How should the label influence property valuation? etc.). The report talks about operational ratings as well understood. While Portfolio Manager is certainly well known in some sectors, there is still a lot of confusion about what operational ratings mean, if they can be trusted and how they should be used. People have a feeling for what it means to get an Energy Star rating, but linking that to building systems performance and building operations decisions is still not clear for many owners and managers. Portfolio Manager also does not yet provide ratings for multifamily properties, which is a key sector in MA that is also identified in the report as a target for the pilot.

2. I was pleased to see the report reference several existing standards from EPA, ASHRAE, COMNET, and ASTM. It is important that the program be coordinated with existing standards both for consistency of methods and to reduce the burden on owners needing to work with many different standards in different parts of the country. Building energy data collection methods should also be aligned with the new ASTM BEPA standard.

3. For the asset rating, the guidelines for modeling seem like the lynchpin of the effort. I would encourage MA DOER to rigorously test and evaluate the modeling procedures used to generate the asset rating to be sure that the guidelines are sufficient to get consistent results between modelers.

4. Think about tools for monitoring - not just labeling. On its own, a building energy label is a powerful tool for creating a market for efficient buildings. But there is big a missed opportunity if this effort is limited to periodic labeling and doesn't encourage ongoing monitoring - especially for buildings that won't be required to label because they aren't changing hands. Consider subsidizing or encouraging the use of tools that allow continuous monitoring, and facilitate data collection and analysis for labeling. If you incentivize continuous monitoring I think you'll find that vendors rise to the challenge of helping buildings comply with the standard AND owners end up seeing a lot of collateral savings that wouldn't be generated from a label alone.

5. How will the labeling data be housed and analyzed? As the report notes, CBECS isn't a large enough data set to understand performance trends for specific building types by state, or regions. This seems like a great opportunity to build a comprehensive database of building energy performance for MA. In order to do that, however, the data will need to be collected and housed in a way that enables future analysis and access. Given the challenges of managing this type of database and privacy issues, this question shouldn't be left as an after-thought but considered early on in the planning and pilot process.